

The Honorable Benjamin H. Settle

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

SEA GREEN PARTNERS, LLC, a Washington  
limited liability company dba SEA MARINE,  
LLC

Plaintiff,

v.

BARBARA GAIL, Official Number 670676, her  
engines, machinery, tackle, apparel, furniture,  
equipment, cargo, and appurtenances, and *In*  
*Rem*, RICHARD PACK and BARBARA  
ZIMONJA, his wife, and their marital  
community, MARGENE MARINE LLC, a  
Wyoming limited liability company, WESTERN  
WATERS LLC, a Colorado limited liability  
company, *In Personam*,

Defendants.

AT LAW AND IN ADMIRALTY

No. 3:20-cv-05142-BHS

STIPULATED MOTION  
and ORDER  
FOR REMOVAL OF ONLINE REVIEWS

**STIPULATION**

COME NOW the parties, by and through their respective counsel, and hereby enter this stipulation for an order for the removal/deletion of online reviews and/or complaints, however characterized, Defendants posted or caused to be posted about Plaintiff. Defendants seek to comply with the parties' settlement agreement, which requires, in relevant part, that Defendants remove/delete the subject online reviews and/or complaints. One website, www.complaintsboard.com, hosting some of the subject reviews and/or complaints, requires a

STIPULATED MOTION and ORDER FOR REMOVAL  
OF ONLINE REVIEWS – Page 1 (3:20-cv-05142-BHS)

MULLAVEY, PROUT, GRENLEY & FOE, LLP

2401 NW 65<sup>TH</sup>  
P.O. BOX 70567  
SEATTLE, WA 98127-0567  
(206) 789-2511  
FAX: (206) 789-4484

signed court order in order to remove/delete the subject reviews and/or complaints. In light of these facts, the parties respectfully request the Court sign an Order authorizing Defendant Richard Pack to permanently remove/delete from www.complaintsboard.com the subject reviews and/or complaints from www.complaintsboard.com, in addition to any comments thereto, and requiring Defendant Richard Pack to request removal/deletion of the subject reviews and/or complaints within one week of this Order's entry.

The subject reviews to be removed/deleted are as follows:

“xxxxxxxxxxxxxxxxxxxxxxxxzzzzzz of US  
Dec 08, 2021 3:35 pm EST  
Verified customer

#### **Electrical Fire**

FIRE—Went to Sea Marine, and on our work order, we had no request from us for electrical work. Our boat had no previous electrical issues before arriving at Sea Marine, but Sea Marine decided we needed electrical wiring replacement. Sea Marine hired a subcontractor to go through the wiring whose background was installing car stereos? FIRE, lots of Smoke.

**Desired outcome:** Help”

“Update by xxxxxxxxxxxxxxxxxxxzzzzzz  
Dec 08, 2021 3:36 pm EST

Sea Marine

419 Jackson St B, Port Townsend, WA 98368”

“Unhappy for sure of Salt Lake City, US  
Dec 09, 2021 7:12 pm EST  
Verified customer

Chris Bakken, Sea Marine General Manager, always has a story to tell that he hopes will cover any responsibility for workmanship done by Sea Marine.

The truth is that the switch had been tested before taking the boat to Sea Marine by a licensed surveyor as well as others and no problems. The

switch failed because someone ran a hot lead back to the switch from the  
 termination point.  
 I am looking forward to Chris Bakken's story because he always has one  
 to cover himself."

"XXXXXXXXXXXXXXXXXXXXZZZZZ of US  
 Mar 08, 2022 1:15 am EST  
 Verified customer

#### **Installation of Stern thruster.**

Went to Sea Marine to have stern thruster installed. Sea Marine installed  
 upside down and this is the way they delivered the boat back to us. Cannot  
 access inspection plate or work on it. Will need to have someone reinstall  
 correctly.  
Read full review of Sea Marine"

"XXXXXXXXXXXXXXXXXXXXZZZZZ of US  
 Nov 01, 2019 1:09 am EDT  
 Verified customer

#### **workmanship**

In my opinion, the canvas work done by Sea Marine is very mediocre.  
 Here is the way Sea Marine charges. They give you a price. If job goes  
 over they will charge you more. If the job is under they will charge you  
 the price they first gave you. It's all about Sea Marine.  
 They had to redo the canvas 3 times on my job. So they were very  
 comfortable in charging me for all 3 redos even though it was Sea Marine  
 mistake. When I caught the bogus charge and complained to Chris Bakken  
 he was very reluctant to take it off. Said he was a time and material  
 operation. In my opinion he hopes the customers are stupid.  
Read full review of Sea Marine and 1 comment"

"R-english of US  
 Oct 16, 2019 10:40 pm EDT

#### **Not worth going to sea marine**

Bad experience. Before I showed for my scheduled work to start on May  
 1, I tried to get details about where to tie up and where we were hauling  
 out and never got a response the week before I showed up. I then called  
 again, on my way down to deliver the boat, with no response from Chris  
 Bakken. They did not start work for over a week. Then honestly,

everything they did was mediocre and unacceptable – no trained employees at sea marine. Subcontractors did most of the work and were not certified.

Read full review of Sea Marine and 4 comments”

“Joe Joe Manning of HK  
Oct 16, 2019 5:42 pm EDT  
Verified customer

Beware. Sea marine web page says they are experts. Lies, lies... All the info on their web page is old. They no longer have trained employees. They shorted out my electrical system, and I am still trying to get my boat back working like it did before I took it to Chris Bakken at Sea Marine. Dishonest operation. Chris Bakken pads his invoices so look for it. My advice is to go anywhere else.”

“DickZ of US  
Oct 16, 2019 6:04 pm EDT  
Verified customer

Sea Marine replaced my site gauge on my water tank. Sea Marine employee cracked the glass during installation. Found the problem the day after I left. Chris Bakken said it was my problem. I will never go near Sea Marine again. They are very dishonest — awful work done at Sea Marine. I heard they were going into a lawsuit because of their dealings with their customers.”

STIPULATED TO this 6<sup>th</sup> day of April, 2023.

MULLAVEY, PROUT, GRENLEY & FOE, LLP HOLMES WEDDLE & BARCOTT PC

*s/Daniel A. S. Foe*

*s/Lafcadio Darling*

---

Daniel A. S. Foe, WSBA No. 42876  
Aaron J. Naff, WSBA No. 51200  
Attorneys for Plaintiff  
2401 NW 65<sup>th</sup> Street  
P.O. Box 70567  
Seattle, WA 98127  
Phone: 206-789-2511  
Email: dfoe@ballardlawyers.com  
Email: anaff@ballardlawyers.com

---

Lafcadio Darling, WSBA No. 29963  
Attorneys for Defendant/Counterclaim  
Plaintiffs  
3101 Western Avenue, Suite 2600  
Seattle, WA 98121  
Phone: 206-292-8008  
Email: ldarling@hwb-law.com  
Email: klavoie@hwb-law.com

1 DAVIS ROTHWELL EARLE & XÓCHIHUA

2  
3 *s/ John E. Moore*

4 \_\_\_\_\_  
5 John E. Moore, WSBA No. 45888  
6 Attorneys for Counterclaim Defendant  
7 701 5<sup>th</sup> Avenue, Suite 5500  
8 Seattle, WA 98104  
9 Phone: 206-622-2295  
10 Email: jmoore@davisrothwell.com  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

STIPULATED MOTION and ORDER FOR REMOVAL  
OF ONLINE REVIEWS – Page 5 (3:20-cv-05142-BHS)

**MULLAVEY, PROUT, GRENLEY & FOE, LLP**

2401 NW 65<sup>TH</sup>  
P.O. BOX 70567  
SEATTLE, WA 98127-0567  
(206) 789-2511  
FAX: (206) 789-4484

**ORDER**

BASED on the foregoing Stipulation, it is hereby

ORDERED that the following reviews shall be permanently removed/deleted from  
www.complaintsboard.com:

“xxxxxxxxxxxxxxxxxxxxxxxxzzzzzz of US  
Dec 08, 2021 3:35 pm EST  
Verified customer

**Electrical Fire**

FIRE—Went to Sea Marine, and on our work order, we had no request from us for electrical work. Our boat had no previous electrical issues before arriving at Sea Marine, but Sea Marine decided we needed electrical wiring replacement. Sea Marine hired a subcontractor to go through the wiring whose background was installing car stereos? FIRE, lots of Smoke.

**Desired outcome:** Help”

“Update by xxxxxxxxxxxxxxxxxxxzzzzzz  
Dec 08, 2021 3:36 pm EST

Sea Marine

419 Jackson St B, Port Townsend, WA 98368”

“Unhappy for sure of Salt Lake City, US  
Dec 09, 2021 7:12 pm EST  
Verified customer

Chris Bakken, Sea Marine General Manager, always has a story to tell that he hopes will cover any responsibility for workmanship done by Sea Marine.

The truth is that the switch had been tested before taking the boat to Sea Marine by a licensed surveyor as well as others and no problems. The switch failed because someone ran a hot lead back to the switch from the termination point.

I am looking forward to Chris Bakken’s story because he always has one to cover himself.”

“xxxxxxxxxxxxxxxxxxxxxxxxzzzzzz of US

Mar 08, 2022 1:15 am EST  
Verified customer

**Installation of Stern thruster.**

Went to Sea Marine to have stern thruster installed. Sea Marine installed upside down and this is the way they delivered the boat back to us. Cannot access inspection plate or work on it. Will need to have someone reinstall correctly.

[Read full review of Sea Marine](#)

“xxxxxxxxxxxxxxxxxxxxxxxxzzzzzz of US  
Nov 01, 2019 1:09 am EDT  
Verified customer

**workmanship**

In my opinion, the canvas work done by Sea Marine is very mediocre. Here is the way Sea Marine charges. They give you a price. If job goes over they will charge you more. If the job is under they will charge you the price they first gave you. It's all about Sea Marine. They had to redo the canvas 3 times on my job. So they were very comfortable in charging me for all 3 redos even though it was Sea Marine mistake. When I caught the bogus charge and complained to Chris Bakken he was very reluctant to take it off. Said he was a time and material operation. In my opinion he hopes the customers are stupid.  
Read full review of Sea Marine and 1 comment”

“R-english of US  
Oct 16, 2019 10:40 pm EDT

**Not worth going to sea marine**

Bad experience. Before I showed for my scheduled work to start on may 1, I tried to get details about where to tie up and where we were hauling out and never got a response the week before I showed up. I then called again, on my way down to deliver the boat, with no response from chris bakken. They did not start work for over a week. Then honestly, everything they did was mediocre and unacceptable – no trained employees at sea marine. Subcontractors did most of the work and were not certified.  
Read full review of Sea Marine and 4 comments”

“Joe Joe Manning of HK

1 Oct 16, 2019 5:42 pm EDT  
2 Verified customer

3 Beware. Sea marine web page says they are experts. Lies, lies... All the  
4 info on their web page is old. They no longer have trained employees.  
5 They shorted out my electrical system, and I am still trying to get my boat  
6 back working like it did before I took it to Chris Bakken at Sea Marine.  
Dishonest operation. Chris Bakken pads his invoices so look for it. My  
advice is to go anywhere else."

7 "DickZ of US  
8 Oct 16, 2019 6:04 pm EDT  
Verified customer

9 See Marine replaced my site gauge on my water tank. Sea Marine  
10 employee cracked the glass during installation. Found the problem the day  
11 after I left. Chris Bakken said it was my problem. I will never go near Sea  
12 Marine again. They are very dishonest — awful work done at Sea Marine.  
I heard they were going into a lawsuit because of their dealings with their  
customers."

13  
14 Defendant Richard Pack, in conformance with the parties' settlement agreement, shall  
15 convey this Order to [www.complaintsboard.com](http://www.complaintsboard.com) and request the permanent removal/deletion of  
16 the aforementioned reviews and/or complaints, in addition to any comments thereto, from  
17 [www.complaintsboard.com](http://www.complaintsboard.com) within one week of this Order's entry.  
18

19 IT IS SO ORDERED this 7th day of April, 2023.

20  
21  
22 

23 HONORABLE BENJAMIN H. SETTLE  
24 UNITED STATES DISTRICT JUDGE  
25

26 //  
//



1 *Prepared by:*  
2 MULLAVEY, PROUT, GRENLEY & FOE, LLP

3 *s/Daniel A. S. Foe*

4 \_\_\_\_\_  
5 Daniel A. S. Foe, WSBA No. 42876

6 Aaron J. Naff, WSBA No. 51200

7 Attorneys for Plaintiff

8 2401 NW 65<sup>th</sup> Street

9 P.O. Box 70567

10 Seattle, WA 98127

11 Phone: 206-789-2511

12 Email: dfoe@ballardlawyers.com

13 Email: anaff@ballardlawyers.com  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26